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April 24th deadline for federal USA PATRIOT Act compliance

On October 26, 2001, President Bush signed into law the "Uniting and Strengthening America by Providing Appropriate Tools Required to Intercept and Obstruct Terrorism (USA PATRIOT) Act of 2001" (the Act). This law, enacted in response to the terrorist attacks of September 11, 2001, strengthens our nation's ability to combat terrorism and prevent and detect money-laundering activities.

Director Nat Shapo is issuing a Company Bulletin (CB #2002-03) to entities regulated by the Illinois Department of Insurance to advise them of important new responsibilities under the Act. In particular, Section 352 of the Act amends the Bank Secrecy Act ("BSA")² to require that all financial institutions establish an anti-money laundering program, and Section 326 amends the BSA to require the Secretary of the Treasury (Treasury) to adopt minimum standards for financial institutions regarding the identity of customers that open accounts. Insurers are financial institutions subject to this new law.

Section 352—Establishing Anti-Money Laundering Programs

Section 352 of the Act requires the establishment of an **anti-mon-ey laundering program**, including, at a minimum:

- The development of internal policies, procedures, and controls. These should be appropriate for the level of risk of money laundering identified.
- The designation of a compliance officer. The officer should have appropriate training and background to execute their responsibilities. In addition, the compliance officer should have access to senior management.
- An ongoing employee training program. A training program should match training to the employees' roles in the organization and their job functions. The training program should be provided as often as necessary to address gaps created by movement of employees within the organization and turnover.
- An independent audit function to test the programs. The independent audit function does not require engaging outside consultants. Internal staff that is independent of those developing and executing the antimoney laundering program may conduct the audit.

Treasury is currently drafting a regulation describing the anti-money laundering compliance program for insurers. The regulation may borrow

deadline (cont'd on page 2)

² Codified in subchapter II of chapter 53 of title 31, U.S. Code.

¹ The full text of the law can be obtained at **www.access.gpo.gov/congress**. Scroll to public and private laws, select 107th Congress, and select Public Law 107-56.

deadline (cont'd from page 1)

from the anti-money laundering compliance program rule recently proposed by the NASD for broker-dealers,³ and is expected to be promulgated in late spring or early summer.

Insurance companies are included in the BSA's definition of financial institution, and should be prepared to comply with the new law and the regulations promulgated thereunder. Section 352 of the Act becomes effective on April 24, 2002; all insurance companies are required to be in compliance with the law by that date.

As part of its rulemaking process, Treasury is determining the extent to which other insurance entities will be considered financial institutions for purposes of the regulation. It is anticipated that the regulation could cover all other persons and entities engaged in the business of insurance, including brokers, agents, and managing general agents, and may also include other regulated entities. These insurance entities would be required to comply with the regulation by its effective date.

Anti-money laundering programs are not anticipated to be "one size fits all." Rather, it is expected that they will be developed using a risk-based approach. Development of an anti-money laundering program should begin with identification of those areas, processes and programs that are susceptible to money laundering activities. The practices and proce-

Earlier bulletin on commercial lines terrorism exclusions extended

The Illinois Department of Insurance has issued a new Company Bulletin (CB #2002-02) extending the requirements of CB #2001-11 (Filing Procedures and Requirements for Exclusions Related to Acts of Terrorism) until it is withdrawn by the Director. The original bulletin expired on March 1, 2002, in anticipation that a federal solution to the reinsurance concerns would be approved by that date, and commercial lines terrorism exclusions would no longer be necessary.

Many companies that have filed commercial lines terrorism exclusions or are using ISO commercial lines terrorism exclusions have not complied with CB #2001-11. Beginning March 1, 2002, we are giving companies seven (7) working-days to comply with the requirements or we will disapprove the filing.

All provisions in CB #2001-11 are still in effect, including forms filing requirements, prohibition of terrorism exclusions for Workers' Compensation policies, and provisions applicable to all companies. However, CB #2002-02 amends the earlier bulletin to clarify the original intent of the Policyholder Notification and to address industry concerns about future anticipated loss of adequate reinsurance that would exclude terrorism coverage for currently in-force directwritten policies. The complete text of both bulletins can be found in the Company Information section of our website.

As with the previous bulletin, questions on forms filings should be addressed to: keith_fanning@ins.state.il.us; questions on policy renewal, cancellation, or nonrenewal should be sent to: gayle_neuman@ins.state.il.us. •

dures implemented under the program should reflect the risks of money laundering given the entity's products, methods of distribution, contact with customers and forms of customer payment and deposits.

Section 326—Customer Identification

Section 326 of the Act amends the BSA to require that Treasury issue regulations setting forth minimum standards for financial institutions regarding the identity of their customers in connection with the purchase of a policy or contract of insurance. This program must set forth customer identity verification and documentation procedures, as well as procedures the insurer will employ to notify its customers about this requirement and determine whether the customer appears on government lists of known or suspected terrorists or terrorist organizations.

Final regulations regarding this requirement are to be issued by the Department of the Treasury by October 26, 2002. Proposed regulations will be published in the Federal Register⁴ later in the year. Through the rulemaking process, Treasury will determine which insurance entities will be subject to the regulations. Insurance entities subject to the rules will be required to comply when the final Treasury regulations become effective.

Requests for additional information or questions regarding:

- Illinois Company Bulletin (CB #2002-03) may be directed to Cynthia Lamar, Illinois Department of Insurance at (217) 782-1785 or cindy_lamar@ins.state.il.us;
- the Act may be directed to Linda L. Duzick, Office of Thrift Supervision, serving as insurance industry liaison for the Department of the Treasury, at (202) 906-6565 or linda.duzick@ots.treas.gov. •

³ 67CFR 8565 (February 25, 2002)

⁴ The Federal Register website address is www.access.gpo.gov/nara

Department releases results of survey on insurers' use of credit

The Illinois Department of Insurance has released the results of a survey on the use of consumers' credit histories by the Illinois property and casualty insurance industry. Due to public concern about this practice, the survey was sent in April 2001 to all Illinois personal lines auto and homeowners insurers to determine whether they are using credit information to underwrite and/or rate policies, and if so, to what extent.

"The insurance industry's use of credit information in making underwriting and rating decisions is generating increased public awareness and interest," Insurance Director Nat Shapo said. "We conducted this survey as a fact-finding exercise to gain a better understanding of the role of credit in the Illinois insurance market. The survey looked at several areas relating to use of credit, including number of companies using it, how they are using it, and whether and how they are disclosing its use to consumers."

The survey results show aggregate information only. Companyspecific information is subject to the confidentiality provisions of the Illinois Insurance Code and will not be released.

Current Illinois law (PA 92-480, effective October 1, 2001) prohibits insurance companies from refusing to issue a new policy or from non-renewing an existing auto or homeowners policy solely due to a credit report.

Shapo said the Department of Insurance presented the results objectively, without making any specific policy recommendations. "Illinois has developed a healthy market-oriented approach toward underwriting and rating insurance products. This survey will likely stimulate further discussion among

elected policymakers, regulators, industry representatives, and consumer groups in evaluating whether current uses of credit are consistent with fostering a competitive marketplace that serves the interests of informed consumers."

The Use of Credit Survey Results are posted in the Reports section of the Department's website. Among the results listed are:

- 205 auto insurance companies (representing 68 percent of the total Illinois personal lines auto market share) and 172 homeowners insurance companies (representing 79 percent of the total Illinois homeowners market share) indicated that they used credit or planned to use it within 12 months from the date of the survey.
- 154 of the 205 auto companies and 138 of the 172 homeowners companies that use credit, order credit information on all applicants.
- 164 auto insurers (comprising 61 percent of the total personal lines auto market) use credit information to rate policies; of those, 112 (comprising 54 percent of the total auto market) charge a higher rate for the consumer with the worst credit; and 67 (representing 14 percent of the total auto market) periodically re-evaluate the insured's credit information.
- 102 homeowners insurers (comprising 29 percent of the total homeowners market) use credit information to rate a policy; of those, 65 (comprising 19 percent of the total homeowners market) charge a higher rate for the consumer with the worst credit; and 54 (representing 15 percent of the total homeowners market) periodi-

cally re-evaluate the insured's credit information.

"The growing use of credit information by insurance companies poses new questions for consumers to consider in shopping for auto and homeowners insurance," Shapo said, offering the following advice:

- Become an informed consumer. The Department has posted a detailed consumer fact sheet entitled *Understanding How Insurers Use Credit Information* on its website.
- Compare coverage and rates with several insurance companies.
- Ask agents or company representatives whether their company uses credit information and, if so, how.
- Carefully review your personal credit information with each of the three major credit reporting agencies and take the steps necessary to correct mistakes. Don't assume that correcting an error with one credit reporting agency automatically corrects it with another.
- If you find errors in your credit information, ask your agent or company representative whether the corrected information will lower your rate.

The three credit reporting agencies commonly used by insurance companies are:

- Equifax (www.credit.equifax. com or 800-685-1111);
- Experian (www.experian.com or 888-397-3742); and
- Trans Union (www.trans-union.com or 800-888-4213).◆

Gallant and Valor Insurance Companies ordered into conservation

Illinois Insurance Director Nat Shapo obtained an Order of Conservation against Gallant and Valor Insurance Companies on February 25, 2002, following the Department of Insurance's determination that both companies are insolvent by more than \$1 million. Pursuant to statute, the order had been confidential until the Circuit Court of Cook County lifted the sequestration on March 14, 2002.

Gallant is a wholly owned subsidiary of J and P Holdings Incorporated. Valor, in turn, is a wholly owned subsidiary of Gallant Insurance Company. Both companies are members of the Warrior Insurance Group of Bedford Park, Illinois. Gallant was originally incorporated in November 1977 as the Allied American Insurance Company. The current name was adopted in July 1995. Valor was incorporated in December 1989 as the Unicorn Insurance Company. Its name was changed to the Hallberg Direct Insurance Company in 1992, and to Valor in July 1995.

Both companies are licensed in the states of Illinois and Indiana, and primarily write private passenger automobile liability and physical damage coverages. As of February 20, 2002, the companies insured 115,980 drivers in Illinois and 23,352 in Indiana.

The Conservation Order allows the Director to conserve the assets of the company for the protection of its claimants and creditors, pending further recommendations to the Supervising Court. The order also contains an injunction prohibiting suits against the company outside of the conservation proceedings, as well as a moratorium on the payment of claims and loss adjustment expenses subject to certain hardship provisions for

claims occurring prior to January 1, 2002.

Shapo said the Department of Insurance has approved an arrangement for Affirmative Insurance Company to assume or reinsure all in-force business of Gallant and Valor effective January 1, 2002. As such, Affirmative is responsible for policy claims which occurred on or after that date. Affirmative is an Illinois domestic

carrier and member of the Vesta Insurance Group of Birmingham, AL, and is licensed in 24 states including Illinois and Indiana.

Conservation proceedings are being handled by the Office of the Special Deputy Receiver representing the Director of Insurance, 222 Merchandise Mart Plaza, Suite 1450, Chicago, Illinois 60654; (312) 836-9500.◆

Bogus medical claim providers targeting IL insurers

-by Scott Richardson

As a member of the Illinois State Police Financial & Cyber-Crime Unit, the Department of Insurance has recently become aware of a medical claim provider scam operating in Illinois.

The bogus claims may not be immediately detectible because they contain stolen information that correctly identifies the names, social security numbers and birth dates of employees covered under an employer's health or workers compensation insurance. The fraudulent claims are being sent directly to the patient's employer or to a third party administrator. All entities involved in processing medical claims, including health insurers and workers compensation carriers, should be on the lookout for claim submissions with the following characteristics:

• Requests for payment are being sent from and directed back to a medical provider with a post office box in Miami, FL.

- PO boxes identified to date include: PO Box 025240-SJO #6772, Miami, FL 33102; PO Box 025369-SJO #480, Miami, FL 33102; and PO Box 028508-SJO #9088, Miami, FL 22126. SJO indicates the mail is being forwarded to San Jose Santamaris Airport in Costa Rica.
- The doctor's name on the medical claim is usually followed by the letters "Md." instead of "M.D."
- The claim form may be accompanied by a W-9 Request for Taxpayer Identification Number and Certification.

Insurers are urged to verify questionable claims with the employee or patient and to report any suspicious or fraudulent claims activities to:

Scott R. Richardson, Investigator Illinois State Police Financial & CyberCrime Unit 400 West Monroe Springfield, IL 62704 (217) 782-5512 or richasc@isp.state.il.us ◆

Producers-Just Say No

-by Tris Schnepper Non-Admitted Insurers Regulatory Unit

Former First Lady Nancy Regan made the slogan "Just Say No" popular in an attempt to get the youth of this nation to reject the temptations of using drugs.

Illinois insurance producers would benefit from applying the same slogan when approached to sell suspicious, too good to be true, under priced, or "we take all" association or union health benefit plans. These sham programs always claim to be exempt from state regulation but solicit producers licensed by the Illinois Department of Insurance to market them. Often, in place of commissions, they will pay "consulting" fees.

In a recent meeting with United States Department of Labor representatives, the following criteria were suggested for evaluating a bona fide program.

For Association Plans

- Check process by which formed.
- Check purpose for which formed.
- Check how members are solicited.
- Check to see who actually controls the benefit program.

For Union Plans

- Check to see if plan is selffunded and marketed to employers (including sole proprietors).
- Check to see who pays employees' dues.
- Check to see if it is being solicited by licensed producers.
- Check to see if commissions or remunerations are being paid to solicitors.

Chances are, a true union or association plan would not be soliciting licensed insurance producers to distribute their health insurance program. Nor would they be apt to pay a commission or consulting fee for applications remitted to them.

Bogus association or union benefit plans are nothing more than unauthorized insurance companies. When discovered to be operating in Illinois, the Department of Insurance will issue them a cease and desist order. Producers should be aware that under Section 121.4 of the Illinois Insurance Code (215 ILCS 5/121-4) anyone who aids and abets in the production of unauthorized insurance will be held responsible for any unpaid valid claims.

Illinois producers should also note that some insurance companies have filed endorsements to their professional liability policies for insurance agents excluding errors and omissions coverage when the producer places the business with a Multiple Employer Welfare Arrangement. One such specific exclusion reads as follows:

"This policy does not apply to any claim arising from or contributed to by the placement of coverage with multiple employer welfare arrangements as defined in ERISA and any amendments thereto."

In addition to the financial liability issue, producers who place business with unauthorized insurers may also face disciplinary action, including license suspension or revocation, for violations of Section 500-70 of the Illinois Insurance Code.

You have worked hard to become a licensed producer to write insurance business for authorized insurance companies. Do not put your license in jeopardy by writing for unauthorized entities offering health insurance coverage. When approached to do so, "Just Say No"!◆

Department rules review

The full text of Department rules is printed in the *Illinois Register* published weekly by the Illinois Secretary of State's Index Department, 111 E. Monroe St., Springfield, IL 62756. Subscriptions are available from that source for an annual fee of \$290. Issue numbers and a Department contact person are listed below after each rule summary.

Copies of rules are also available upon written request to the Department of Insurance at a \$1 per page charge. Some rules are posted on the Department's website at www.state.il.us/ins/industryinfo.htm. Adopted rules are

codified in Title 50 of the Illinois Administrative Code.

Rule 2004 (Accident and Health Reserves) was amended effective February 19, 2002, because the current rule has not been revised for years and is outmoded. Further, the adoption of the NAIC Statutory Accounting Practices and Procedures Manual incorporated the NAIC Model Law for Minimum Reserve Standards for Individual and Group Health Insurance. The man- ual is revised yearly and automatically adopts any changes to the model law. (Vol. 26, #9; Jim Hanson). ◆

Legislative update

SB 989 (PA 92-530)—effective 2/08/02 —amends the Intergovernmental Cooperation Act to expand the definition of "public agency" to include any public agency defined in or created under the Act, any local public entity as defined in the Local Governmental and Governmental Employees Tort Immunity Act, and any agency, authority, instrumentality, council, board, service region, district, unit, bureau, commission, municipal corporation, college, or university, whether corporate or otherwise, and any other local governmental body or similar entity that is presently existing or created after the effective date of the amendatory

Senate Bill 989 also stipulates that only public agency members with tax receipts, tax revenues, taxing authority, or other resources sufficient to pay costs and to service debt related to intergovern-

mental activities, or public agency members created by or as part of a public agency with these powers may enter into contracts in regard to **joint self-insurance pools**.

SB 1046 (PA 92-0518)—effective 6/01/02—replaces Condominium Property Act provisions concerning insurance for condominium associations and risk pooling trust funds for condominium associations or common interest community associations. Senate Bill 1046 requires that a condo association maintain property insurance, general liability insurance, and a fidelity bond and liability coverage for directors and officers, and provides that a condo association may require unit owners to obtain insurance coverage. The Director of Insurance is given authority to adopt reasonable rules pertaining to the standards of coverage and administration of risk pooling trust funds.♦

Company action

New Companies

Argus Fire and Casualty
Insurance Company, FL, 12/31/01
Risk Administration Services
Attorney-in-Fact for the Dakota
Truck Underwriters, SD, 12/31/01

Market Conduct Fines

The following entity was issued a Stipulation and Consent Order and fined for Insurance Code violations and/or improper claims practices cited in its Illinois market conduct examination:

Universal Casualty Company, 2/11/02; \$75,000

Terminations

Phico Insurance Company, PA, declared insolvent and placed in liquidation, 2/01/02

Rock River Insurance Co., WI, cancelled its Certificate of Authority, 3/15/02◆

Agent education seminars

The National Flood Insurance Program and the Illinois FAIR Plan Association are offering seminars on the following dates. Insurance producers can earn 7 Continuing Education hours for enrolling in both courses.

Locations and Dates

Carbondale, IL—April 30, 2002 Springfield, IL—May 1, 2002 Champaign, IL—May 2, 2002 Lisle, IL—May 15, 2002 South Holland, IL—May 16, 2002

For registration, agenda, or more information, contact the Professional Independent Insurance Agents of Illinois at (217) 793-6660 or check their website at: www.piiai.org. •

Exam reports filed

Financial

Albion District Mutual Windstorm and Cyclone Insurance Company 2/21/02

Allstate Life Insurance Company 2/15/02

American General Assurance Co. 1/17/02

Carthage Mutual Insurance Co. 1/29/02

Farmers Albion Mutual County Fire Insurance Company 2/21/02

Illinois Movers' & Warehouseman's Risk Management Group 2/06/02

Independent Mutual Fire Ins. Co. 3/01/02

MidStates Reinsurance Corp. 2/06/02

Nunda-Algonquin Mutual Fire Insurance Company 3/01/02

Olney Township Mutual Fire Insurance Company 3/01/02

Woodford County Mutual Ins. Co. 1/14/02

Woodbine Mutual Fire Ins. Co. 1/14/02

Market Conduct

Paul Revere Life Insurance Co. 1/18/02

Provident Life & Accident Ins. Co. 1/18/02

American Country Insurance Co. 2/04/02

Universal Casualty Company 2/11/02 ♦

Hearings

Scheduled Hearings:

Andrew M. Martinez Hearing No. 3886 License denial 2/14/02

J.R.A. Carpenter Contractors Hearing No. 3891 Assessment 2/05/02

Brothers Enterprises, Inc. Hearing No. 3893 Assessment 4/23/02

Behning Custom Carpentry Ltd. Hearing No. 3895 Assessment 2/19/02

L.J. Keefe Co. Hearing No. 3896 Assessment 2/20/02

Road Fabrics, Inc. Hearing No. 3898 Assessment 2/21/02

Advanced Remodeling Concepts, Inc. Hearing No. 3899 Assessment 2/22/02

McCarty Brothers, Inc. Hearing No. 3900 Assessment 2/25/02

Chicago Midwest Meat Assoc.

Hearing No. 3901 Assessment 2/26/02

Illinois Grocers Risk Management Assoc. Hearing No. 3902 Assessment 2/27/02

Peoria Area Chamber of Commerce Trust Hearing No. 3903 Assessment 2/28/02

Illinois Non-Profit Risk Management

Hearing No. 3904 Assessment 4/01/02

Illinois AG Service Workers Compensation Trust

Hearing No. 3905 Assessment 3/04/02

Workers Compensation Trust of IL Hearing No. 3906

Assessment 3/05/02

Illinois State Bowling Proprietor & Recreational Industry Workers

Compensation Trust Hearing No. 3907 Assessment 3/06/02

Nursing Homes Risk Management Assoc.

Hearing No. 3908 Assessment 5/14/02 Consolidated Construction Safety Fund of Illinois

Hearing No. 3909 Assessment 3/08/02

Risk Management Association of the Residential Construction Employers

Council

Hearing No. 3910 Assessment 4/25/02

Associated Beer Distributors of IL Risk Management Association

Hearing No. 3911 Assessment 4/12/02

McDonald's Operators Risk Management Assoc., Inc. Hearing No. 3912 Assessment 5/13/02

Illinois Restaurant Risk Management

Hearing No. 3913 Assessment 3/14/02

Mid West Truckers Risk Management

Hearing No. 3914 Assessment 5/20/02

Illinois Movers & Warehousemen's Risk

Management Assoc. Hearing No. 3915 Assessment 5/21/02

Illinois Cooperative Workers' Compensation Group Hearing No. 3916 Assessment 5/22/02

Illinois State Ambulance Risk Management Assoc. Hearing No. 3917

Assessment 5/23/02

Illinois Aggregate Producers Risk

Management Assoc. Hearing No. 3918 Assessment 5/24/02

IL Press Assoc. Risk Management Group

Hearing No. 3919 Assessment 5/29/02

Construction Employers Risk

Management Assoc. Hearing No. 3920 Assessment 5/28/02

Residential Carpentry, Inc. Hearing No. 3922 Assessment 4/25/02

Michael J. Weber Hearing No. 3923

License revocation 3/14/02

Radny Cable Hearing No. 3924 Assessment 3/29/02

Tom & Sharon Rakestraw State Farm Fire & Casualty Co. Hearing No. 3927 Nonrenewal 3/06/02

Patti Hornback

Country Mutual Insurance Co. Hearing No. 3928

Cancellation 3/19/02

Kazimierz Skora Safeway Insurance Co. Hearing No. 3929 Cancellation 3/20/02

Cindy R. Newman United Services Auto Assoc.

Hearing No. 3930 Cancellation 3/26/02

Anthony Abdul Haqq Hearing No. 3931 License denial 4/10/02

Edward Armstrong Fox Hearing No. 3932

License suspension 4/18/02

Stanley & Marcia Catterson Hearing No. 3933

Policy cancellation 4/17/02

Settled without Hearing:

Craig Gunby USAA Casualty Company Hearing No. 3925 Dismissed 3/06/02

Keith Bradley

State Farm Fire & Casualty Co.

Hearing No. 3926 Dismissed: 3/12/02

Enterprises Industries, Inc. Hearing No. 3888 Dismissed 2/05/02

Traditional Concepts, Inc. Hearing No. 3889 Dismissed 1/25/02

Bristol Transport, Inc. Hearing No. 3890 Dismissed 2/06/02

Classic Construction, Inc. Hearing No. 3890 Dismissed 1/25/02

II In One Contractors Hearing No. 3894 Dismissed 2/27/02

(cont'd on pg. 8)

Producer regulatory action

(Copies of regulatory orders are available upon written request to the Producer Regulatory Unit, for \$1/page. The number of pages are indicated in parentheses following the effective date.)

Stipulation and Consent Order—Civil Forfeiture Paid

William Anthony George 6701 South Crandon #3 AC Chicago, IL 60649 Effective 1/10/02 (4)

Marcello A. Rojas 5631 North Christiana Chicago, IL 60659 Effective 1/14/02 (3)

Denial of Producer License

Dustin Scott Cochran 273 Center Street PO Box 239 Crab Orchard, WV 25827 Effective 2/07/02 (8)

Dennis C. Combs Jr. 3530 Eastridge Lane St. Ann, MO 63074 Effective 1/23/02 (5)

Charla Earls 8801 South Constance Chicago, IL 60617 Effective 1/04/02 (11)

Curtis J. VanTassel 27740 Roger Road Evan Mills, NY 13637 Effective 1/14/02 (7)

Jason K. Walljasper 918 North Monroe Street Abingdon, IL 61410 Effective 2/07/02 (2)

Revocation of Producer License

21st Century Resources 7500 Viscount, Suite 171 El Paso, TX 79925 Effective 2/22/02 (2)

TTC Illinois 50 Meadowview Center Kankakee, IL 60901 Effective 1/03/02 (3)

Thomas R. Koonce 115 Heritage Delavan, IL 61734 Effective 1/19/02 (17)

Deborah Jupiter-Thomas 10234 South Rhodes Chicago, IL 60628 Effective 1/31/02 (16)

Voluntary Revocation of **Producer License**

Global Risk LLC 29 LaSalle Street, Suite 310 Chicago, IL 60603 Effective 2/13/02 (1)

Suspension Lifted

Rochelle L. Lilly 18161 South Versailles, Apt. 202 Hazelcrest, IL 60429 Effective 6/14/00 to 1/10/02

Suspension of Producer License

Edwin Joseph Baker 68 Santa Anita Drive Maryville, IL 62062 Effective 2/07/02 (2)

Ron J. Biedron 9345 South Sacramento Evergreen Park, IL 60805 Effective 2/08/02 (2)

Joseph F. O'Connell 10458 South Drako Avenue Chicago, IL 60655 Effective 2/07/02 (2)◆

Hearings (cont'd from pg. 7)

Settled without Hearing (cont'd):

C. D. Ishmael Construction Hearing No. 3921 Dismissed 3/14/02

Completed Hearings:

Wells & Wells Construction, Inc. Hearing No. 3887 Assessment upheld 3/06/02

Midwest Refinishing, Inc. Legion Indemnity Hearing No. 3897 Cancellation upheld 2/22/02◆

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